



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

XIANG LI,  
aka "Lilinbo,"  
BOWEN ZHOU,  
aka "Roger Zhou,"

Defendants.

CR 8:25-cr-00133-JVS

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy; 18  
U.S.C. §§ 2261A(2)(A), (B),  
2261(b)(5): Stalking]

The Grand Jury charges:

COUNT ONE

[ALL DEFENDANTS]

[18 U.S.C. § 371]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant XIANG LI, also known as ("aka") "Lilinbo,"  
resided in San Bernardino County, within the Central District of  
California.

2. Defendant BOWEN ZHOU, aka "Roger Zhou," resided in San  
Bernardino County, within the Central District of California.

1           3.     Victims 1 and 2 maintained a home and were residents of  
2 Orange County, within the Central District of California. In or  
3 around March and April 2024, Victim 2 was located in the People's  
4 Republic of China.

5     B.     OBJECT OF THE CONSPIRACY

6           4.     Beginning on an unknown date but not later than in or  
7 around March 2024, and continuing until at least on or about April  
8 29, 2024, in San Bernardino and Orange Counties, within the Central  
9 District of California, and elsewhere, defendants LI and ZHOU, and  
10 others known and unknown to the Grand Jury, knowingly conspired and  
11 agreed with each other to commit the offense of stalking, in  
12 violation of Title 18, United States Code, Sections 2261A(2)(A), (B).

13     C.     MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
14             ACCOMPLISHED

15           5.     The object of the conspiracy was to be accomplished in  
16 substance as follows:

17                 (a)     Defendants LI and ZHOU, and co-conspirators known and  
18 unknown, would communicate about stalking, threatening, and  
19 intimidating Victims 1 and 2.

20                 (b)     Defendants LI and ZHOU, and co-conspirators known and  
21 unknown, would obtain prepaid cellular phones and phone numbers (the  
22 "burner phones" and "burner phone numbers"), which the co-  
23 conspirators used to threaten Victims 1 and 2.

24                 (c)     Defendant LI would obtain a vehicle so the co-  
25 conspirators could travel to the Victims' residence to stalk,  
26 threaten, and intimidate the Victims.

27                 (d)     Defendants LI and ZHOU would take steps to conceal the  
28 license plate number affixed to the co-conspirators' vehicle by,

1 among other things, using and removing a cover to obscure the license  
2 plate number.

3 (e) Defendant LI, defendant ZHOU, and/or co-conspirators  
4 known and unknown, would travel to the Victims' residence to stalk,  
5 threaten, and intimidate the victims by, among other things, leaving  
6 threatening notes, using a firearm to discharge multiple bullets into  
7 the Victims' residence, and leaving a knife on the Victims' doorstep.

8 (f) Defendants LI and ZHOU would use their residences to  
9 store and conceal burner phones, ammunition, and a firearm.

10 D. OVERT ACTS

11 6. In furtherance of the conspiracy and to accomplish its  
12 object, on or about the following dates, defendants LI and ZHOU, and  
13 others known and unknown to the Grand Jury, committed and caused to  
14 be committed various overt acts including, but not limited to, the  
15 following:

16 Overt Act No. 1: On March 7, 2024, defendant ZHOU and/or a  
17 co-conspirator activated a prepaid cellular phone number ending in  
18 5032 (the "5032 burner phone") without providing any personal  
19 identifying information.

20 Overt Act No. 2: On March 7, 2024, defendant ZHOU and/or a  
21 co-conspirator used the 5032 burner phone to place multiple phone  
22 calls to Victims 1 and 2.

23 Overt Act No. 3: On March 7, 2024, in a phone call using the  
24 5032 burner phone, defendant ZHOU and/or a co-conspirator told Victim  
25 2, "Are you going to give me my \$150,000?"

26 Overt Act No. 4: On or before March 15, 2024, defendant LI  
27 obtained an SUV-style vehicle for the co-conspirators to use to stalk  
28 Victims 1 and 2.

1        Overt Act No. 5:        On March 15, 2024, defendant LI, defendant  
2 ZHOU, and/or other co-conspirators drove to the Victims' residence  
3 located in Yorba Linda, California (the "Victims' residence") to  
4 stalk, harass, and intimidate Victims 1 and 2.

5        Overt Act No. 6:        On March 15, 2024, defendant LI, defendant  
6 ZHOU, and/or a co-conspirator walked to the Victims' doorstep and  
7 left a threatening note and a knife. The note was written in the  
8 Mandarin language and stated something to the effect: "Your man has  
9 owed us a 150,000 debt for a long time. Now I am informing you that  
10 if you still don't pay the money, your family will not be safe."

11       Overt Act No. 7:        On March 16, 2024, defendant ZHOU and/or a  
12 co-conspirator used the 5032 burner phone to place multiple calls to  
13 Victims 1 and 2, including a call to Victim 2 in which the co-  
14 conspirator stated, "I know where your family lives, and we have a  
15 lot of gangsters in the L.A area."

16       Overt Act No. 8:        On March 22, 2024, defendant ZHOU or a co-  
17 conspirator activated a prepaid cellular phone number ending in 4158  
18 (the "4158 burner phone") without providing any personal identifying  
19 information.

20       Overt Act No. 9:        On March 31, 2024, defendants LI and/or ZHOU  
21 and others known and unknown to the Grand Jury drove to the Victims'  
22 residence to stalk, harass, and intimidate Victims 1 and 2.

23       Overt Act No. 10:       On March 31, 2024, defendants LI and/or ZHOU  
24 took photographs of the Victims' residence to stalk, harass, and  
25 intimidate Victims 1 and 2.

26       Overt Act No. 11:       On April 1, 2024, defendant ZHOU or a co-  
27 conspirator activated a prepaid cellular phone number ending in 5979  
28 (the "5979 burner phone") without providing any personal identifying

1 information.

2 Overt Act No. 12: On April 1, 2024, defendant ZHOU and/or a  
3 co-conspirator used the 5979 burner phone to place multiple calls to  
4 Victims 1 and 2 and, during a call to Victim 2, stated: "Did you get  
5 my gift yesterday?"

6 Overt Act No. 13: On April 4, 2024, defendants LI and ZHOU,  
7 and co-conspirators known and unknown, drove to the Victims'  
8 residence to stalk, harass, and intimidate the Victims, including by  
9 shooting approximately six gunshots at the Victims' residence.

10 Overt Act No. 14: On April 19, 2024, defendant LI and/or a co-  
11 conspirator activated a prepaid cellular phone number ending in 8108  
12 (the "8108 burner phone") without providing any personal identifying  
13 information.

14 Overt Act No. 15: On April 24, 2024, defendant LI and/or a co-  
15 conspirator used the 8108 burner phone to send a text message to  
16 Victims 1 and 2 that stated:

17 Mr. [Z] and Ms. [Z], it has been a while since I tried but  
18 unable to get in touch with you. We have been paying  
19 attention to the news. It appears your family is quite  
20 lucky so far. Our brother(s) who delivered the gift(s) to  
21 you had made sure there were people at home before the  
22 delivery(s) was/were made, but I did not expect that none  
23 of you received it/them. Since you have increased our  
24 workload and the boss is also unhappy about it, now the  
price is USD \$160,000. If your family is willing to gamble  
with the safety of your whole family, then we can continue  
to do the matter. Unless you son of a bitch pay the money,  
we will keep on sending gifts to all the members of your  
family until the people are gone! You can try!

25 Overt Act No. 16: On April 29, 2024, defendant LI and/or a co-  
26 conspirator used the 8108 burner phone to send a text message to  
27 Victims 1 and 2 that stated: "I really admire you [sic] courage.  
28 Okay, will follow your idea. Let's continue and see if you guys will

1 be crashed."

COUNT TWO

[ALL DEFENDANTS]

[18 U.S.C. §§ 2261A(2) (A), (B), 2261(b) (5), 18 U.S.C. § 2]

The Grand Jury incorporates and re-alleges the allegations set forth in paragraphs 1-3 and 5-6 above, as if fully set forth herein. Beginning on an unknown date but no later than in or around March 2024, and continuing until at least on or about April 29, 2024, defendants XIANG LI, aka "Lilinbo," and BOWEN ZHOU, aka "Roger Zhou," with the intent to harass and intimidate Victims 1 and 2, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, cellular telephone networks, interstate wires, and the Internet, to engage in a course of conduct, described in paragraphs 5 and 6 above, that placed the Victims in reasonable fear of death and serious bodily injury to the Victims and immediate family members of the Victims, and caused, attempted to cause, and would reasonably be expected to

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1 cause, substantial emotional distress to the Victims and immediate  
2 family members of the Victims.

3  
4  
5 A TRUE BILL

6  
7 /s/  
8 Foreperson

9 BILAL A. ESSAYLI  
10 United States Attorney

11 

12 DAVID T. RYAN  
13 Assistant United States Attorney  
14 Chief, National Security Division

15 IAN V. YANNIELLO  
16 Assistant United States Attorney  
17 Chief, Terrorism and Export Crimes  
18 Section

19 JOSEPH S. GUZMAN  
20 Assistant United States Attorney  
21 Terrorism and Export Crimes Section

22 COLIN S. SCOTT  
23 Assistant United States Attorney  
24 Terrorism and Export Crimes Section  
25  
26  
27  
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